

MICHAEL C. VAN, ESQ.
Nevada Bar No. 3876
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
VC2 LAW
8985 S. Eastern Ave., Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770
Facsimile: (702) 478-7779
Email: michael@vc2law.com
garrett@vc2law.com

Attorneys and Local Counsel for Plaintiffs

FARHAD NOVIAN (California Bar No. 118129; admitted pro hac vice)
farhad@novianlaw.com
ANDREW B. GOODMAN (California Bar No. 267972; admitted pro hac vice)
agoodman@novianlaw.com
ALEXANDER B. GURA (California Bar No. 305096; admitted pro hac vice)
gura@novianlaw.com
NOVIAN & NOVIAN, LLP
1801 Century Park East, Suite 1201
Los Angeles, CA 90067
Telephone: (310) 553-1222
Facsimile: (310) 553-0222

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

MARIA TSATAS, an individual; LEONIDAS VALKANAS, as trustee of the KEET TRUST dated August 1, 2015; RAYMOND BARAZ, an individual; PASCAL ABDALLAH, an individual; JIMMY TSOUTSOURAS, an individual; FOTINI VENETIS, an individual; NICHOLAS TSOUTSOURAS, an individual; CONNIE TSOUTSOURAS, an individual; RAYMONDE KANHA, an individual; ALFRED BEKHIT, an individual; JACQUEZ ELBAZ, an individual; MARTINE BENEZRA, an individual; JAMES P. CARROLL, an individual; DAVID CHIN, an individual; JENNIFER MILLS, an individual; PAUL SUBLETT, an individual; ANDREW SUBLETT, an individual; MANOLIS KOSTAKIS, an individual; ESTHER GEORGAKOPOULOS, an individual; EVAGELIA KOSTAKIS, an individual;

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATED REQUEST FOR
EXTENSION OF DISPOSITIVE MOTION
DEADLINE AND DEADLINE TO FILE
JOINT PRETRIAL ORDER BY
APPROXIMATELY 28 DAYS, AND
REQUEST FOR ENTRY OF PROPOSED
BRIEFING SCHEDULE FOR DISPOSITIVE
MOTIONS**

(Twelfth Request)

VC2 LAW
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Tel: (702) 478-7770 o Fax: (702) 478-7779

DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO GALUPPO, an individual; DENIS KOPITAS, an individual; TERRY TSATAS, an individual; GEORGE TSATAS, an individual; PANAGIOTA TSATAS, an individual; OURANIA TSATAS, an individual; KIRIAKOS PRIMBAS, an individual; EVANTHIA PRIMBAS, an individual; PATRICK AYOUB, an individual; MICHAEL BESCEC, an individual; ERNEST LEBOEUF, an individual; PHILIPPE LEGAULT, an individual; EFTIHIOS LITSAKIS, an individual; GIOVANNI MONCADA, an individual; MARC RIEL, an individual; JARADEH SALIM, an individual; HANI HAMAM, an individual; CONSTANTIN ZISSIS, an individual; BESSIE PEPPAS, an individual; NIKI PALIOVRAKAS, an individual,

Plaintiffs,

v.

AIRBORNE WIRELESS NETWORK, INC., a Nevada Corporation; MICHAEL J. WARREN, an individual; J. EDWARD DANIELS, an individual; MARIUS DE MOS, an individual; JASON DE MOS, an individual; ROBERT BRUCE HARRIS, an individual; KELLY KABILAFKAS, an individual; and APCENTIVE, INC., a Nevada Corporation,

Defendants.

STIPULATED REQUEST FOR EXTENSION OF DEADLINES AND PROPOSED
BRIEFING SCHEDULE FOR DISPOSITIVE MOTIONS

Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption, with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulated Request for Extension of Dispositive Motion Deadline and Deadline to File Joint Pretrial Order by Approximately 28 days, pursuant to FRCP 6(b) and 16(b), as well as LR 26-3 and LR IA 6-1.

WHEREAS, this is the Parties’ twelfth request for an extension of deadlines in the scheduling order.

WHEREAS, on December 18, 2023, the Court granted Defendants Airborne and Apcentive’s most recent request for an extension of the scheduling order (ECF No. 235), such that the following cutoff dates currently apply:

Dispositive Motions – April 17, 2024

Proposed Joint Pretrial Order – May 17, 2024, or 30 days after the final dispositive motion is ruled upon.

WHEREAS, pursuant to LR 26-3, the Parties agree on the following:

WHEREAS, the discovery cutoff date of March 18, 2024 has lapsed and the Parties are not asking to reopen discovery.

WHEREAS, on March 7, 2024, Defendants filed a Motion for Case Dispositive Sanctions (ECF No. 242), for which the Response and Reply deadlines were originally on March 21, 2024 and March 28, 2024, respectively.

WHEREAS, due to meet and confer efforts regarding the filing and striking of “CONFIDENTIAL” material pursuant to the August 9, 2021 Stipulated Protective Order and Confidentiality Agreement (ECF No. 64), and Plaintiffs’ counsel’s trial in another matter set for April 3, 2024, the Parties stipulated to extensions of the Response and Reply deadlines for Defendants’ Motion for Case Dispositive Sanctions. ECF Nos. 246, 249.

1 WHEREAS, the Court granted both stipulations (ECF Nos. 248, 250), and the Responses
2 and Replies for Defendants' Motion for Case Dispositive Sanctions are currently due on April 4,
3 2024 and April 12, 2024.

4 WHEREAS, during the 28 days the Parties have been preparing Responses and Replies to
5 Defendants' Motion for Case Dispositive Sanctions, they will not be able to devote time to
6 preparing dispositive motions.

7 WHEREAS, due to the complexity of the anticipated dispositive motions, the Parties
8 further agree that a stipulated briefing schedule is appropriate that provides slightly more time for
9 responses and replies than the default deadlines under the Local Rules.

10 WHEREAS, the Parties have met and conferred about the timing of the responses and
11 replies for dispositive motions to accommodate a trial schedule for Defendants' counsel.

12 WHEREAS, the Parties do not dispute that both sides have acted diligently since the last
13 request for an extension, and good cause supports an extension of approximately 28 days to each
14 remaining cutoff date,

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by
16 and through their respective attorneys of record, that the below-listed proposed schedule should
17 govern this case, without prejudice to requests for further extensions for good cause:

18 Dispositive Motions – May 15, 2024

19 Responses to Dispositive Motions due – June 19, 2024

20 Replies to Dispositive Motions due – July 10, 2024

21 Proposed Joint Pretrial Order – August 9, 2024, or 30 days after the final dispositive
22 motion is ruled upon.

23 **IT IS SO STIPULATED.**

24
25 DATED: April 1, 2024

26 Respectfully submitted.

27 VC2 LAW
28 NOVIAN & NOVIAN, LLP

VC2 LAW
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Tel: (702) 478-7770 o Fax: (702) 478-7779

By: /s/ Andrew B. Goodman

MICHAEL C. VAN, ESQ. #3876
GARRETT R. CHASE, ESQ. #14498
8985 S. Eastern Ave., Suite 100
Las Vegas, Nevada 89123

FARHAD NOVIAN, ESQ. (CA Bar No. 118129)
ANDREW B. GOODMAN, ESQ. (CA Bar No.
267972)
ALEXANDER BRENDON GURA, ESQ. (CA Bar
No. 305096)
1801 Century Park East, Suite 1201
Los Angeles, CA 90067
Attorneys for Plaintiffs

DATED: April 1, 2024

Respectfully submitted.

CHASEY LAW OFFICES
LAW OFFICES OF S. DON BENNION

By: /s/ Peter L. Chasey

PETER L. CHASEY, ESQ. #7650
3295 N. Fort Apache Road, Suite 110
Las Vegas, Nevada 89129

S. Don Bennion, Esq. #4530
6980 O'Bannon Drive, Suite 400
Las Vegas, Nevada 89117

Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 4/3/2024

CERTIFICATE OF SERVICE

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On April 1, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

VC2 LAW
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Tel: (702) 478-7770 o Fax: (702) 478-7779

VC2 LAW
 8985 South Eastern Avenue, Suite 100
 Las Vegas, Nevada 89123
 Tel: (702) 478-7770 o Fax: (702) 478-7779

Peter L. Chasey, Esq.
 Chasey Law Offices
 3295 N. Fort Apache Road, Suite 110
 Las Vegas, Nevada 89129
 Email: peter@chaseylaw.com

☐ Via Hand Delivery
☒ Via First Class Mail
☐ Via Facsimile
☒ Via Electronic Mail
☒ Via CM/ECF

S. Don Bennion, Esq.
 Law Offices of S. Don Bennion
 6980 O'Bannon Drive, Suite 400
 Las Vegas, NV 89117
 Email: don@bennionlaw.com

Sofia Kardaras
 Email: sophiakard@gmail.com

Jimmy Asmaklis
 Email: jda86@outlook.com

Michael Bescec
 Email: mbescec@outlook.com

Ernest Leboeuf
 Email: erniejleboeuf@gmail.com

Constantin Zissis
 Email: kostazissis@live.ca

Eftihios Listakis
 Email: information@constructionleandre.com

Phillipe Legault
 4031 Rue Oliver
 Laval, Quebec, Canada H7R5Y6

Giovanni Moncada
 204 Ivy Jay Crescent
 Aurora, Ontario, Canada L4G-0E9

Jaradeh Salim
 11515 Rue LaForest
 Montreal, Quebec, Canada H3M2W5

Hani Hamam
 7550 Querbes Ave.
 Montreal, Quebec, Canada H3N 2B6

Marius de Mos
 Email: wind-power@msn.com

DATED April 1, 2024.

/s/ Amanda McGill

VC2 LAW
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Tel: (702) 478-7770 o Fax: (702) 478-7779

Amanda McGill – Legal Assistant
Novian & Novian, LLP
1801 Century Park East, Suite 1201
Los Angeles, CA 90067
Tel: (310) 553-1222
Fax: (310) 553-0222
Email: amanda@novianlaw.com